

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public
Works,

Defendants.

Gaffney Board of Public Works,

Defendant/Counter- and Cross-
Claimant,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Counterclaim Defendant,

and

Litchain Corp.,

Defendant/Crossclaim-Defendant.

C/A No.: 7:23-cv-01427-TMC

**BLOCKQUARRY'S *UNOPPOSED*
MOTION FOR ENLARGEMENT OF
TIME TO RESPOND TO THE
MOTION TO STRIKE FILED BY
GAFFNEY BOARD OF PUBLIC
WORKS**

Plaintiff/Counterclaim Defendant Blockquarry Corp. f/k/a ISW Holdings, Inc. ("Blockquarry"), pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Civ. Rule 6.01 (D.S.C.), requests the Court enter an order permitting a one-week extension for Blockquarry to file a response to the motion to strike the declarations of Lawrence Davis, Beau Bartch, and Shawn Vaught from the public case record. (ECF No. 96, "Motion".) The Motion was filed by

Defendant/Counter- and Cross-Claimant Gaffney Board of Public Works (the “Utility”). In support thereof, Blockquarry states the following.

The Utility filed its Motion on March 12, 2024, requesting that the Court strike certain affidavits filed by Blockquarry. Blockquarry’s deadline to file a response to the Motion is tomorrow—*i.e.*, March 26, 2024. In the meantime, Blockquarry has been diligently pursuing its interest in the instant action, having dismissed certain claims on March 19, 2024 (ECF No. 101) and filing a response brief to another motion on March 20, 2024 (ECF No. 102).

The instant motion is not for undue delay or other improper motive. Blockquarry’s request for a one-week extension would make the new deadline for filing a response April 2, 2024. The requested extension will not affect other deadlines.

Pursuant to Local Civ. Rule 7.02 (D.S.C.), counsel for Blockquarry consulted with counsel for the Utility, in advance of this filing, and the Utility consents to the relief sought herein.

WHEREFORE Blockquarry requests this Court extent its time to respond to the Motion to April 2, 2024.

Respectfully submitted,

March 25, 2024

Greenville, South Carolina

156690688

FOX ROTHSCHILD LLP

2 W. Washington Street
Suite 1100
Greenville, SC 29601
Tel: 864.751.7600

/s/R. Taylor Speer

R. Taylor Speer, Federal ID# 12267
tspeer@foxrothschild.com

*Attorneys for Plaintiff Blockquarry Corp. f/k/a
ISW Holdings, Inc.*